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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 JOHN MEGGS, Individually,  
13 Plaintiffs,

Case No.: 2:14-cv-01798-JCM-CWH

14 vs.

15 MHD VEGAS REALTY CORPORATION., a  
16 Nevada Corporation,  
17 Defendant.

**JOINT DISCOVERY PLAN AND  
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH  
L.R. 26-1(e)**

18  
19 All parties of record participated in the meeting required under Fed. R. Civ. P. 26(f) and  
20 which was held on June 29, 2015. Pursuant to Fed. R. Civ. P. 26(f), the parties do hereby stipulate  
21 to the following discovery plan and scheduling order:

22 1. **Discovery Cut-Off Date.** Defendant first Answered the Complaint on May 7, 2015.  
23 The parties request a discovery period of one hundred and eighty (180) days from May 7, 2015. The  
24 discovery period, therefore, will close on **Tuesday, November 3, 2015.**

25 2. **Amending the Pleadings and Adding Parties.** The date for filing motions to amend  
26 the pleadings or to add parties shall not be later than ninety (90) days prior to the close of discovery  
27 or **Wednesday, August 5, 2015.**

28 3. **Expert Witness Disclosures.** The disclosure of any expert witness shall be made

1 sixty (60) days before the discovery deadline or **Friday, September 4, 2015**. The disclosures of any  
2 rebuttal experts shall be due thirty (30) days (30 days falls on Sunday, September 28, 2014) after the  
3 initial disclosures of experts or **Monday, October 5, 2015**. The requirements of Fed.R.Civ.P.  
4 26(a)(2)(B) shall apply to any such disclosures.

5 4. **Dispositive Motions**. Dispositive Motions shall be filed not later than thirty (30)  
6 days after the discovery cut-off date or **Thursday, December 3, 2015**.

7 5. **Pre-Trial Order**. The Joint Pre-Trial Order shall be filed not later than thirty (30)  
8 days after the date set for filing dispositive motions or **Monday, January 4, 2016**. However, in the  
9 event that dispositive motions are filed, the date for filing the Joint Pre-Trial Order shall be  
10 suspended until thirty (30) days after a decision on the dispositive motions or further order of the  
11 Court. The disclosures required by Rule 26(a)(3) and any objection thereto shall be included in the  
12 Pre-Trial Order.

13 6. **Rule 26(a)(3) Disclosures**. The disclosures required by Rule 26(a)(3) and any  
14 objection thereto shall be included in the pre-trial order.

15 7. The parties will make their initial disclosures on or before **Thursday, July 30, 2015**.  
16 No changes need to be made in the timing, form or requirements for such disclosures.

17 8. No changes should be made on the limitations on discovery imposed under the  
18 Federal Rules of Civil Procedure or local rules, or on the subject matters or timing of discovery.

19 9. Discovery does not need to be conducted in phases or limited or focused on particular  
20 issues.

21 10. **Rule 26(f)(3) C-D**

22 a. **Rule 26(f)(3)C**. There are no issues about disclosure or discovery of  
23 electronically stored information, including the form or forms in which it should be produced.

24 b. **Rule 26(f)(3)D**. There are no issues about claims of privilege or of protection  
25 in trial preparation materials, but the Parties may revisit the issue at a later time.

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**ORDER**

IT IS SO ORDERED.

DATED: July 1, 2015

United States Magistrate Judge